

FILED
SCRANTON

MAR 28 2024

PER

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

EDWARD SARTORIS
PLAINTIFF

CIVIL NO. 3:23-CV-640

✓
WARDEN HAUDLE, ETAL JUDGE R.D. MARIANI
DEFENDANTS

MOTION TO COMPEL DISCOVERY

PURSUANT TO RULE 26 AND RULES 33 AND 34 OF THE FEDERAL RULES OF CIVIL PROCEDURE, PLAINTIFF HAS REQUESTED DOCUMENTS AND OR RECORDS TO BE PROVIDED TO HIM FOR REVIEW. IN ADDITION, THE PLAINTIFF WISHES TO SCHEDULE "ON-SITE" INSPECTIONS TO DETERMINE CERTAIN ASPECTS OF THOSE CONDITIONS.

- 1) PLAINTIFF HAS WRITTEN TO DEFENSE COUNSEL AS A MEANS TO REWORD SOME INTERROGATORIES
- 2) IN REGARDS TO "BURDENSOME ASSEMBLY OF RECORDS", YES IT IS A NECESSARY BURDEN TO PERFORM ANY "WORK"; BUT WORK IS WHAT IS PERFORMED TO BE PAID.

3) ALL INTERROGATORIES AND REQUEST FOR RECORDS CANNOT BE SO BURDENSOME. IF NEEDED BE A PROTECTIVE ORDER CAN BE SOUGHT.

4) ONE INMATE, SPECIFICALLY THE PLAINTIFFS, RECORDS FROM INMATE ACCOUNT AND GRIEVANCES IS NECESSARY TO COMPARE FOR THE COMPARISON OF FACTUAL RECORDS. IT SHOULD BE NOTED THAT WITHDRAWALS FROM MY INMATE ACCOUNT TO PAY COURT FEES "DISAPPEARED" - RETALIATION.

THIS REQUEST, ALONG WITH A 60 DAY EXTENSION FOR DISCOVERY IS NOW NECESSARY TO ACCOMPLISH REQUIRED FACT FINDING QUERIES.

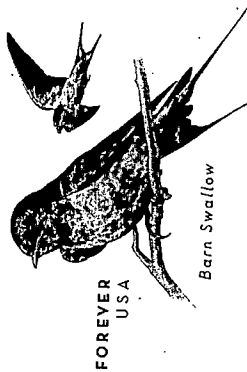
RESPECTFULLY REQUESTED
~~Edward Sartoris~~ PRO-SE
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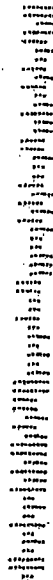
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CLERK OF COURTS
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MIDDLE DISTRICT OF PENNSYLVANIA
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